



EPA Region 5 Records Ctr.



393573

Rockford Products Corporation

707 Harrison Avenue  
Rockford, Illinois 61108-7197  
(815) 397-6000  
Easy Link 910997-7453

February 24, 1986

Illinois Environmental Protection Agency  
Region 1 - DWPC  
4302 North Main Street  
Rockford, Illinois 61103

RECEIVED  
REGION 1 DWPC

Attention: Mr. Harris Chien  
Manager

FEB 28 1986

Reference: HAZARDOUS SPILL - FEBRUARY 5, 1986 -

ENVIRONMENTAL PROTECTION AGENCY  
STATE OF ILLINOIS

Dear Mr. Chien:

On February 5, 1986, at approximately 10:15 A.M., we had a spill on our  
→ Plant #3 roof located at 707 Harrison Avenue. Area affected was approximately  
500 square feet.

Approximately 50 to 100 gallons of 1,1,1 trichlorethane was spilled during  
a filling operation. The vendor delivering the 1,1,1 trichlorethane brought  
more than our tank could hold and some excess flowed out of the roof vent. We  
had a man posted on the roof and another with the delivery truck driver. The  
man on the roof stopped the pumping as fast as he could.

Most of the 1,1,1 trichlorethane was absorbed into the roofing material,  
but some did get to a roof drain, which flows to an open ditch at the south  
west corner of Plant #3 on Kishwaukee Street.

I reported the incident to you at about 11:05 A.M., the same day. In  
that conversation, I reported that the 1,1,1 trichlorethane would end up in  
the seepage pit. Later we discovered that some roof drains on the west side  
of the plant actually flow into the open ditch.

We had the contaminated roofing material analyzed and reported this to  
you on February 7, 1986. After discussion with your staff, you reported to  
me that the roofing material could stay, and no further requirements were  
necessary, since we have been working with you on the seepage pit future.

This letter is being sent as a confirmation of our discussion and per  
your request.

Sincerely yours,

ROCKFORD PRODUCTS CORP.

cc: Aaron Hardt  
Bill Nail  
Larry Hammond

Phil Carnock  
Manager Plant Facilities

PC/nc

# APPENDIX FORM 2

A

LANDFILL

I

## WASTE STORED TREATED OR DISPOSED OF

- A. LANDFILL WAS USED FOR THE DISPOSAL OF WHEELABRATOR GRIT AND BAG HOUSE DUST.
- B. USED SOLUABLE OIL AND
- C. SOME MACHINERY AND PARTS.

HAZARDOUS  
INCINERATOR  
BURNED FOOT  
FOOT, FOOT, FOOT

FROM THE  
HAZARDOUS OIL  
NON HAZARDOUS?  
INCINERATOR?

II

## WASTES CONSIDERED HAZARDOUS OR HAVING HAZARDOUS CONSTITUENTS UNDER R.C.R.A.

WHEELABRATOR DUST AND GRIT ANALYSIS IS PRESENTED IN IT'S PRESENT FORM. ROCKFORD PRODUCTS DOES NOT BELIEVE THAT ANY CHANGES HAVE BEEN MADE TO AFFECT THE ANALYSIS. HAZARDOUS COMPONENTS ARE: NONE

SOLUABLE OIL USED IS APPROXIMATELY 85% WATER - 15% VEGETABLE OIL AND ADDITIVES PRESENTLY NON-HAZARDOUS - NON RCRA REGULATED.

MACHINE PARTS CONSISTED OF IRON AND STEEL COMPONENTS WITH LESS THAN 1% BRASS (BEARINGS). ALSO, HAD A SMALL AMOUNT OF GREASE AND OIL IN BEARINGS ETC..

III

## QUANTITIES OR VOLUME OF WASTES DISPOSED ON AND THE DATES OF DISPOSAL.

WHEELABRATOR DUST AND GRIT WAS HAULED INTO THE LANDFILL SITE IN 55 GALLON DRUMS WITH LINERS FROM 1968 - 1978. STARTING IN 1978, A CLEAN UP OF ALL OBTAINABLE DRUMS WAS UNDERTAKEN, AND THE DRUMS WERE REMOVED FROM THE SITE. AVERAGE WEEKLY LOAD 5 CUBIC FEET OR TOTAL LANDFILL 2,695 CU. FT. DUST AND GRIT.

SOLUABLE OIL WAS DISCHARGED INTO LANDFILL FROM 1968 THROUGH 1975. ESTIMATED 800 GALLONS PER WEEK OR 313,600 TOTAL GALLONS.

MACHINES AND PARTS DUMPED IN 1972 ON TWO SEPARATE OCCASIONS - APPROXIMATELY 75 MACHINES WEIGHING 200 LBS. PER MACHINES. 30 OF THE MACHINES WERE REMOVED & SOLD FOR SCRAP IN 1977.

IV

## DESCRIPTION OF EACH UNIT AND INCLUDE CAPACITY, DIMENSIONS, LOCATION OF FACILITY, PROVIDE A SITE MAP OR PLAN IF AVAILABLE.

LANDFILL CONSISTED OF A DEPRESSION APPROXIMATELY 100 FT. LONG - 35' WIDE AND 11 TO 12 FT. DEEP. SEE ATTACHED PRINT GIVING LOCATION OF LANDFILL ON ROCKFORD PRODUCTS CORPORATION SURVEY PLAT - ARNOLD LUNDGREN.

RECEIVED

FEB 06 1986

IEPA-DI.PC

# APPENDIX FORM 2

B-1

PRENCO INCINERATOR

**I** WASTE STORED TREATED OR DISPOSED OF  
WASTE INCLUDED A 85% WASTE OIL - 15% PLATING SLUDGE THAT CONTINUALLY STAYED IN A AGITATION TANK UNTIL BURNED BY PRENCO INCINERATOR.

**II** WASTES CONSIDERED HAZARDOUS OR HAVING HAZARDOUS CONSTITUENTS UNDER R.C.R.A.

WASTES WERE RCRA LISTED:

F001 - F006 - F007- F008

**III** QUANTITIES OR VOLUME OF WASTES DISPOSED ON AND THE DATES OF DISPOSAL.

THE PRENCO INCINERATOR WAS PURCHASED IN MAY OF 1966. IT WAS STARTED UP IN THE FALL OF 1966, AND RAN UNTIL DECEMBER 13, 1983. THE INCINERATOR IS PART OF A CLOSURE PLAN THAT ROCKFORD PRODUCTS WILL IMPLIMENT AS SOON AS PLAN IS APPROVED BY U.S. AND IL. EPA. AVERAGE BURNING RATE- 30 GALLONS PER HOUR - BURNING TIME PER YEAR 1800 HOURS OR 915,000 TOTAL GALLONS, FOR LIFE OF OPERATION.

**IV** DESCRIPTION OF EACH UNIT AND INCLUDE CAPACITY, DIMENSIONS, LOCATION OF FACILITY, PROVIDE A SITE MAP OR PLAN IF AVAILABLE.

PRENCO INCINERATOR UTILIZED AN AREA OF 24' x 20'. IN THIS AREA WAS THE MAIN BURNING UNIT. 2 (1000) GALLON TANKS WITH AGITATORS, A CONTROL PANEL AND SCRUBBER UNITS. ALSO 1 - 4000 GALLON STORAGE TANK.

SEE MAP FOR LOCATION OF UNIT AT PLANT #3. (2300 SPCC)

RECEIVED

FEB 06 1986

IEPA-DI.PC

# APPENDIX FORM 2

B2

BRULE INCINERATOR

I WASTE STORED TREATED OR DISPOSED OF.  
TYPE "O" WASTE AND WASTE OIL WAS INCINERATED.

II WASTES CONSIDERED HAZARDOUS OR HAVING HAZARDOUS  
CONSTITUENTS UNDER R.C.R.A.

TO THE BEST OF ROCKFORD PRODUCTS KNOWLEDGE, ONLY TYPE "O" SCRAP AND WASTE OILS WERE  
USED AS FUEL FOR INCINERATOR, EXCEPT FOR START UP WITH NATURAL GAS, THEREFORE, NO  
HAZARDOUS MATERIALS OR CONSTITUENTS WERE BURNED.

III QUANTITIES OR VOLUME OF WASTES DISPOSED ON AND THE  
DATES OF DISPOSAL.

BRULE INCINERATOR WAS STARTED UP IN LATE DECEMBER, 1967. TYPE "O" WASTE INCINERATED  
AT 1050 LBS. PER HOUR - 6 HOURS PER DAY OR APPROXIMATELY 7060 TONS PER YEAR. TOTAL  
TYPE "O" WASTE BURNED TO DATE IS 126,900 TONS.

WASTE OIL INCINERATED AT 450 GALLONS PER DAY OR 105,750 GALLONS PER YEAR. TOTAL  
GALLONS INCINERATED TO DATE IS 1,903,000.

IV DESCRIPTION OF EACH UNIT AND INCLUDE CAPACITY,  
DIMENSIONS, LOCATION OF FACILITY, PROVIDE A SITE  
MAP OR PLAN IF AVAILABLE.

A BRULE INCINERATOR WITH A CAPACITY OF 1050 LBS. OF TYPE "O" SCRAP PER HOUR  
AND 15 GALLONS OF WASTE OIL - 45 GALLONS PER HOUR WHEN BURNING WASTE OIL ONLY.  
UNIT DIMENSIONS 32 FT. LONG - 22 FT. WIDE. STACK HEIGHT 35 FT. SEE PROPERTY  
MAP OF PLANT #3 FOR INCINERATOR LOCATION. (2300 SPCC)

RECEIVED

FEB 06 1986

IEPA-DIPG

# APPENDIX FORM 2

C

STORAGE TANK ABOVE GROUND

## I WASTE STORED TREATED OR DISPOSED OF, TANKS CONTAINED RCRA LISTED WASTE:

F001  
F006  
F007  
F008

## II WASTES CONSIDERED HAZARDOUS OR HAVING HAZARDOUS CONSTITUENTS UNDER R.C.R.A. ARE:

F001  
F006  
F007  
F008

## III QUANTITIES OR VOLUME OF WASTES DISPOSED ON AND THE DATES OF DISPOSAL.

APPROXIMATELY 915,000 GALLONS HAS BEEN PLACED IN TANKS OVER A 17 YEAR PERIOD FROM OCTOBER, 1966 TO 12-13-83 OR 53,623 GALLONS PER YEAR.

## IV DESCRIPTION OF EACH UNIT AND INCLUDE CAPACITY, DIMENSIONS, LOCATION OF FACILITY, PROVIDE A SITE MAP OR PLAN IF AVAILABLE.

THE 3 TANKS ABOVE GROUND - 2 - 1000 GALLONS CAPACITY - 1-4000 GALLONS CAPACITY ARE LOCATED WITH PRENCO INCINERATOR. SEE APPENDIX FORM B1 - PRENCO INCINERATOR. TANKS ARE LOCATED ON SITE PLAN 2300 SPCC

RECEIVED

FEB 06 1986

IEPA-DI/PC

# APPENDIX FORM 2

D

## UNDERGROUND WASTE STORAGE TANKS

### I WASTE STORED TREATED OR DISPOSED OF.

#1 FUEL OIL, WASTE OILS, INCLUDING LUBE OILS PARAFIN OIL AND SOME QUENCH OILS.  
1-TANK CONTAINS WASTE OIL WITH 1,1,1 TRICHLORETHANE FROM 10 TO 250 P.P.M.

### II WASTES CONSIDERED HAZARDOUS OR HAVING HAZARDOUS CONSTITUENTS UNDER R.C.R.A.

1- TANK CONTAINING WASTE OIL WITH A VERY SMALL QUANTITY OF 1,1,1 TRICHLORETHANE 10 TO 250 P.P.M. AA-1 TANK - OTHER OILS ARE NON RCRA WASTES.

### III QUANTITIES OR VOLUME OF WASTES DISPOSED ON AND THE DATES OF DISPOSAL.

WASTE OIL WITHOUT 1,1,1 TRICHLORETHANE CONTAMINATES WERE INCINERATED IN BRULE INCINERATOR 1,903,000 GALLONS FROM DECEMBER, 1967 TO DATE.

1,1,1 TRICHLORETHANE WASTE OIL HAS BEEN SENT OUT AFTER CLOSING DOWN HAZARDOUS WASTE INCINERATOR ON DECEMBER 13, 1983. APPROXIMATELY 700 GALLONS EACH 3 WEEKS.

### IV DESCRIPTION OF EACH UNIT AND INCLUDE CAPACITY, DIMENSIONS, LOCATION OF FACILITY, PROVIDE A SITE MAP OR PLAN IF AVAILABLE.

AA1 TANK - WASTE OIL WITH 1,1,1 TRICHLORETHANE  
P, Q, AND R - WASTE OIL SEE MAP 2300 SPCC

(4) 12,000 GALLONS STORAGE TANKS LETTERED P, Q, R, AND AA-1  
TANKS ARE 9' DIAMETER X 25' LONG - 11,928 GALLONS EACH.  
TANKS ARE ON SITE PLAN 2300 SPCC

RECEIVED  
FEB 06 1986

IEPA-DLPG

# APPENDIX FORM 2

E

CONTAINER STORAGE AREA

## I WASTE STORED TREATED OR DISPOSED OF.

RCRA LISTED WASTE:

D006  
D002  
D003  
F002  
F007  
F008  
F009  
P030

## II WASTES CONSIDERED HAZARDOUS OR HAVING HAZARDOUS CONSTITUENTS UNDER R.C.R.A.

RCRA LISTED WASTE:

F002  
F007  
F008  
F009  
D002  
D003  
P030

- CYANIDES (N.O.S.)

## III QUANTITIES OR VOLUME OF WASTES DISPOSED ON AND THE DATES OF DISPOSAL.

PRIOR TO 12-13-83 APPROXIMATELY (1) DRUM PER WEEK WAS STORED IN THIS AREA, PRIOR TO INCINERATION IN PRENCO INCINERATOR. BETWEEN 12/13/83 AND 5/10/85, HAZARDOUS WASTE WAS IN STORAGE AREA.

16 - 55 GALLON DRUMS ON 5/10/85	) ALL THESE WERE REMOVED
27 - 55 GALLON DRUMS ON 6-6-85	) FROM STORAGE AREA & SHIPPED
15 - 55 GALLON DRUMS ON 7-16-85	) TO RCRA REGULATED DISPOSAL
1 - 55 GALLON DRUMS ON 9-24-85	) SITES. <i>WHERE?</i>
5 - 55 GALLON DRUMS ON 12-16-85	)
3 - 165 GALLON WASTE TOLUENE ON 1-17-86	) } TANKS?
4 - 1360 GALLON HAZARDOUS WASTE - NA9189 ON 1-17-86	)

## IV DESCRIPTION OF EACH UNIT AND INCLUDE CAPACITY, DIMENSIONS, LOCATION OF FACILITY, PROVIDE A SITE MAP OR PLAN IF AVAILABLE.

THE CLOSURE AREA IS ON PRINT. PLANT #3 HAZARDOUS MATERIAL STORAGE SHOWING LOCATION AND SIZE. TOTAL AREA HAS A 62 - 55 GALLON DRUM CAPACITY AND OCCUPIES 352.5 SQ. FT.

RECEIVED

FEB 06 1986

IEPA-DIPG

# APPENDIX FORM 2

F

## WASTE WATER TREATMENT UNITS

I WASTE STORED TREATED OR DISPOSED OF,  
ACIDS AND ALKALINE, CHROME AND CYANIDE WASTE STREAMS.

II WASTES CONSIDERED HAZARDOUS OR HAVING HAZARDOUS  
CONSTITUENTS UNDER R.C.R.A.  
WASTES FROM CAUSTIC CLEANING, ACID CLEANING, PLATING BATH WASTES, STRIPPING WASTE  
SOLUTION, AND CERTAIN DIP PROCESSES.

F006

III QUANTITIES OR VOLUME OF WASTES DISPOSED ON AND THE  
DATES OF DISPOSAL.

THE WASTE WATER TREATMENT OPERATION STARTED IN DECEMBER, 1980. THE SYSTEM OPERATES  
24 HOURS DAY - 7 DAYS PER WEEK, EXCEPT FOR APPROXIMATELY 2 WEEKS EACH YEAR WHEN THE  
SYSTEM IS CLOSED DOWN FOR CLEAN UP AND OVERHAUL. MAXIMUM CAPACITY IS 150 GALLONS  
PER MINUTE. THE HAZARDOUS WASTE CAKE IS REMOVED FROM WATER TREATMENT BUILDING  
DAILY - AVERAGE AMOUNT OF SLUDGE CAKE REMOVED EACH DAY IS 3 CU. YDS. THE SLUDGE CAKE  
IS PERMITTED AND HAULED TO AN AUTHORIZED HAZARDOUS WASTE LANDFILL.

IV DESCRIPTION OF EACH UNIT AND INCLUDE CAPACITY,  
DIMENSIONS, LOCATION OF FACILITY, PROVIDE A SITE  
MAP OR PLAN IF AVAILABLE.

THE WATER TREATMENT TANKS, FILTER, CONTROLS, AND PIPING OCCUPY APPROXIMATELY 800 SQ.  
FT. THE SYSTEM REMOVES SOLIDS FROM WASTE WATER BEFORE RELEASING TO THE SANITARY  
SEWER.

SEE MAP 2300 SPCC

RECEIVED

FEB 06 1986

IEPA-DLPC



# APPENDIX FORM 2

G

SEEPAGE PIT

I WASTE STORED TREATED OR DISPOSED OF.  
NONE

II WASTES CONSIDERED HAZARDOUS OR HAVING HAZARDOUS  
CONSTITUENTS UNDER R.C.R.A.

AT PRESENT THERE ARE ORGANIC COMPOUNDS IN THE SEEPAGE PIT.  
1,1,1 TRICHLOROETHANE AND TRICHLOROETHENE, AMOUNTS RANGE FROM 5 P.P.B. TO 80 PARTS PER  
BILLION. A DECISION WILL BE MADE & PRESENTED TO IEPA IN MARCH, 1986, WITH A  
CORRECTION PLAN. THE PLAN INVOLVES TESTING, NEW MONITORING WELLS, DEVERSION OF  
SEEPAGE PIT WATER, ETC.

III QUANTITIES OR VOLUME OF WASTES DISPOSED ON AND THE  
DATES OF DISPOSAL

RAIN WATER AND NON-CONTACT COOLING WATER

PIT RECEIVES RAIN WATER FROM ROOF AND PROPERTY SURROUNDING THE PLANT. THIS AREA  
IS ESTIMATED TO COMPRISE 40 ACRES AND THUS, THE PIT RECEIVED ABOUT 1,000,000  
GALLONS OF RAIN WATER PER EACH 1" OF RAIN. ADDITIONALLY, THE PIT IS PERMITTED  
TO RECEIVE UP TO 35,000 GALLONS OF NON-CONTACT COOLING WATER PER DAY.

IV DESCRIPTION OF EACH UNIT AND INCLUDE CAPACITY,  
DIMENSIONS, LOCATION OF FACILITY, PROVIDE A SITE  
MAP OR PLAN IF AVAILABLE.

SEEPAGE PIT IS LOCATED ON PLANT #3 - SEE SITE MAP FOR LOCATION ON PROPERTY.  
(SURVEY PLAT - ARNOLD LUNDGREN)

EXACT DIMENSIONS AND CAPACITY OF SEEPAGE PIT ARE UNKNOWN DUE TO IT'S IRREGULAR  
DIMENSIONS.

RECEIVED

FEB 06 1986

IEPA-DI.PC